

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

FILED
CLERKS OFFICE

THOMAS J. MCNAMARA,
Plaintiff

v.

MASSACHUSETTS WATER RESOURCES
AUTHORITY, LEROY WALKER, PETER
YARROSI, CAROLYN FIORE, VICTOR
L'ESPERANCE and KAREN BAILEY,
Individually and in their capacities as Agents
Of the Massachusetts Water Resources
Authority,
Defendants

2004 JUN -1 P 3:12

U.S. DISTRICT COURT
DISTRICT OF MASS

C.A. NO. 0410356WGY

DEFENDANTS' REQUIRED DISCLOSURES UNDER FED. R. CIV. P. 26(a)(1)(E)

Pursuant to Fed. R. Civ. P. 26(a)(1)(E) the defendants disclose the following Rule

26(a)(1)(A) – witness disclosure.

1. Leroy J. Walker, 452 Truman Parkway, Milton, Massachusetts 02186
2. Carolyn Fiore, MWRA, (617) 439-7500
3. Peter Yarossi, MWRA, (617) 439-7500
4. Victor L'Esperance, MWRA, (617) 439-7500
5. Karen Bailey, MWRA, (617) 439-7500
6. Karen Gay-Valente, MWRA, (617) 439-7500
7. Kate Murray, MWRA, (617) 439-7500
8. Douglas McDonald, 2884 Coventry Lane, Tumwater, WA 98512-8351
9. Kevin McManus, 40 Locust Street, Marblehead, Massachusetts 01945
10. Jonathan Barnes, 45 Pratt Street, Reading, Massachusetts 01867

Rule 26(a)(1)(B) – Document Disclosure

1. Thomas McNamara personnel file including performance evaluations
wage information.

2. Labor Relations grievance file including any grievances filed by Mr.
McNamara.

3. Medical file regarding Thomas McNamara.

Rule 26(a)(1)(C)(D)

Not applicable.

MASSACHUSETTS WATER
RESOURCES AUTHORITY,
LEROY WALKER, PETER YARROSI,
CAROLYNE FIORE, VICTOR
L'ESPERANCE AND KAREN BAILEY,
Defendants

By their attorney,



Bonnie Gillespie-Perry (BBO #554747)

Senior Staff Counsel

John W. Bishop, Jr. (BBO #043840)

Acting Associate General Counsel

Massachusetts Water Resources

Authority

Charlestown Navy Yard

100 First Avenue

Boston, MA 02129

(617) 788-1181

Dated: May 28, 2004

CERTIFICATE OF SERVICE

I, Bonnie Gillespie-Perry, hereby certify that on the 28th day of May, 2004, I served the foregoing Answer of Massachusetts Water Resources Authority, Leroy Walker, Peter Yarrosi, Carolyn Fiore, Victor L'Esperance, Karen Bailey to the Plaintiff's Complaint by causing a copy to be mailed to:

Gary G. Nolan, Esq.
Nolan Perroni LLP
133 Merrimack Street
Lowell, Massachusetts 01852



Bonnie Gillespie-Perry